

ATTACHMENT E
PLAINTIFFS' PROPOSED FACTS
STIPULATED BY THE PARTIES

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1. Cohen Bryson died as a result of the injuries he sustained in the March 15, 2020, collision.
2. Cohen Bryson was 2 years old at the time of his death.
3. Cohen Bryson was sitting in the second row of the Ford Escape and was properly restrained in his car seat at the time of the collision.
4. Rough Country sells lift kits to all 50 states.
5. Rough Country designed, manufactured, and sold the lift kit installed on the Ford F-250 that rear-ended the Bryson family's Ford Escape.
6. Rough Country sold the lift kit at issue to a Georgia resident.
7. Rough Country marketed and sold the lift kit installed on Mr. Elliott's Ford F-250 as a 4.5-inch lift kit.
8. The lift kit installed on Mr. Elliott's Ford F-250 raised the front bumper approximately six inches.
9. The lift kit involved in this case was a Rough Country lift kit with model number 567.20.
10. Rough Country shipped the lift kit involved in this case to a Georgia resident in Blue Ridge, Georgia.
11. Mr. Elliott subsequently obtained the 2016 Ford F-250 Super Duty truck with the lift kit already installed. (P's Response to SMF, ¶ 18).
12. The lift kit was properly installed on the Ford F-250.
13. Rough Country agrees that its lifts have to be designed to be safe in crashes because crashes happen.

14. Rough Country has not performed any physical crash testing of its lift kits.
15. Rough Country was aware of the Enhanced Vehicle-to-Vehicle Compatibility Agreement when it designed, marketed, and sold the lift kit.
16. The Bryson family was stopped at a red light at the time of the collision.
17. The Bryson family did not cause the collision.
18. Hunter Elliott was at fault for the collision.
19. Mr. Elliott caused his F-250 truck to collide with the Plaintiff's car.
20. Rough Country's lift kit did not cause the collision between Mr. Elliott's F-250 truck and Plaintiffs' car to occur.
21. Mr. Elliott's F-250 truck had tires that were about half an inch larger radius than stock tires.
22. Cohen Bryson's medical expenses were \$2,144.40.
23. Cohen Bryson's funeral expenses were \$3,998.03.